

National Animal Identification System Comments
Docket Number 05-015-1
June 21, 2005

Submitted by Wisconsin Farm Bureau Federation

Answers to questions in the Notice of Availability in the Federal Register

1. A mandatory program is necessary to have a successful animal ID program. The success of the entire program depends upon how easy it will be for livestock producers to comply with the rules and regulations that are in place. Even if the program starts out as a voluntary animal identification program, it will eventually become, in effect, mandatory because of pressure throughout the marketing channels for assurance that livestock have a premise or individual animal identification number.
2. Anyone receiving livestock, whether it's a market, fair, or slaughter facility needs to make sure livestock have a premise identification number or an individual animal identification number before any livestock is unloaded. If an animal is going directly to slaughter the premise identification number should be adequate identification in cases where there is a need to trace back an animal. Animals received at a livestock auction market with only a premise identification number should only be able to go to a slaughter facility. To keep an accurate tracking system, each time livestock moves it needs to be recorded, however, the premise identification number should be utilized wherever possible to help keep costs down.
3. In order for a national animal identification system to work, each animal needs to be tagged with either its premise identification number and/or individual animal ID number at the time the animal leaves the farm. If this is not done there is the risk of games being played with livestock with the potential of animals moving to several locations without being tracked. With respect to third party tagging, there will be always be entrepreneurs who will provide a tagging service. For some livestock producers this may be less costly than doing the tagging themselves.
4. Compliance with tracking animal movement should be the responsibility of the livestock buyer and or marketing agent. In cases for animals going to a fair or exhibition, the fair or exhibition needs to track the movement of the animal.
5. All animals need to be identified when they leave the farm and enter the marketing channel. Exemptions for animals under a certain age should not be a consideration since some diseases can affect animals at any age.
6. With 47 states and five tribes already working on premise registration, the timelines for implementing the NAIS are adequate provided there is not another BSE or other disease outbreak. If there is another animal health scare the time line to implement the program will accelerate and be put in place much sooner. The livestock industry/farm

organizations need to engage Congress to enact legislation addresses producer concerns on liability and confidentiality issues before implementation.

7. All species should be able to meet the timelines established. For the most part, various livestock industry groups have generally determined how they are going to identify the species they work with. The biggest concerns right now are confidentiality, liability and who pays. All species should want to come online at the same time, to avoid losing market share to a competing species.
8. The most cost effective way to get the information will be through an Intranet based system. The method to get the information to the national database will vary among livestock producers. Some will want to deal directly with the government agency or contracted agent while others will want to go through a third party. This should be allowed however there should be only one state database. There should not be separate databases for various species.

In the beginning, there may have to be a paper system to accommodate special case situations (Amish). The state or regional database system can best accomplish premise registration and individual animal identification. Over time, fewer state and/or regional database systems will be required which should reduce costs.

9. The only information that should be submitted to the NAIS is the premises registration number, animal identification number and the movement of the animal if it moves in interstate commerce. Information on animals that never leave the state should stay in the state database.
10. See the answer to question 4.

APHIS Comments

- 1-4. There should not be a private database. The main purpose of the database is to protect and health and public safety. Right now the government maintains brucellosis and TB data. Animal ID could work similar to the system already in place. The database should be a cooperative effort between government and stakeholders within the livestock industry. If a certain livestock industry wants to gather more information for marketing purposes that could be contracted through the database provider.

General Comments

We recognize that the movement of livestock needs to be recorded and believes that the premise ID should be utilized wherever possible to help keep costs down.

- For animals that are usually sold in lots, like hogs or poultry, it makes sense to use a single identification number for the entire group. For cattle, the same process could be used during the sale of a single steer or a group of cattle sold for slaughter or to a single buyer.

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- The WFBF is concerned about the cost of the entire program and more specifically the cost that will be incurred by livestock producers to identify their animals. As traditional price takers, producers cannot and should not bear an unfair share of the costs of establishing or maintaining an animal identification system.
- The WFBF also has concerns regarding confidentiality. Specifically, who will have access to the data used in the National Animal Identification System, and how can producers be assured protection from unintended use of the data they submit? We believe legislation is needed to ensure the privacy of producers' information submitted to the NAIS. Producers must be protected from public disclosure under the Freedom of Information Act (FOIA). Otherwise, competitors or activist groups could exploit proprietary information. Furthermore, there must be clarity on which state and federal agencies will have access to the data and for what purposes.
- With respect to liability, producers need to be protected from the consequences of the actions of others, after their animals are no longer in their own control. Many producers worry that with the availability of an effective trace back system, they might be forced to share liability for food safety problems that are now limited to meat merchandisers.